Comments to WC Docket No. 07-38 from CENTRIS submitted 6/15/07

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Paragraph 31

CENTRIS strongly recommends that the FCC reconsiders a requirement that carriers provide information at the Zip Code level (whether 5 digit or 9 digit). The reasons for this view are:

1. Zip codes change periodically and thus is an inappropriate reference for tracking availability consistently for the same place over time
2. Zip+4 are granular but the FCC must bear in mind that there are thousands of addresses in rural areas without a Zip+4, yet still are identified by census geography.
3. Carrier routes, which are the basis of Zip+4, change over time. There are other issues which can complicate the analysis. These include questions about the appropriate assignment of a Zip+4 to a floor in a building, the accuracy of the assignment of a Zip+4 to a side of a street, and the creation of new Zip+4s to accommodate new housing units.
4. In some cases using Zip+4 data may well be an infringement of a household's privacy
5. These issues imply that maintaining a consistent Zip+4 database over time and place would be both complicated and expensive.

CENTRIS recommends that the FCC adopt Census geographies for this assessment. Census Block Groups and Census Blocks provide geographies that are stable and granular enough to address the FCC's objectives. Since there are approximately 208,000 CBGs and over 8 million Census Blocks it is clear that Census geographies are granular while being location stable for a ten year period. Further, where Zip+4 data is available, Zip+4 data can be readily mapped to Census Blocks.

The Census Block Group focus also provides for the ability to identify locations by Census demographics (age, income, ethnicity, presence of children and so forth) which are factors important in estimating broadband choice and demand.

Paragraph 32

CENTRIS currently provides on a commercial basis, estimates of broadband demand throughout the US at the Census Block Group level and availability of broadband in select markets at the Census Block Group level. CENTRIS uses its omnibus survey, online searches and other proprietary databases to estimate broadband availability. Zip+4 issues notwithstanding, CENTRIS provides these metrics at the Zip and Zip+4 level on a commercially

Paragraph 33

We understand the burdens for carriers to supply subscriber based information. As an alternative, CENTRIS could provide carriers with estimates for their footprint of broadband availability and consumer

subscriber counts (Census block groups within wire centers or Census block groups within MSO franchise areas). In turn, the carriers and MSOs would confirm the accuracy of the estimated assignments that would feed into the revision of CENTRIS' estimate.